



DEPT. OF TRANSPORTATION
DOCKET SECTION

98 JUN 22 AM 11:31

June 16, 1998

Docket No. FHWA 98-3706 - *39*
Docket Clerk
U.S. DOT Dockets
Room PL-40 1
400 Seventh Street, S.W.
Washington, DC 20590-000 1

Dear Sir or Madam:

I am writing to express my deep concern over the proposal to amend the current hours of service **record-**keeping requirements for truckload carriers.

Initially, it is inappropriate to deal with the issue of supporting documentation for hours of service at this time. The FHWA must realize, as those in the industry already do, that we must resolve the hours of service rules *before* we address how to monitor these rules. The current hours of service rules have been only slightly modified since the initial rules were issued in the late 1930's. These rules were created based on incorrect notions on what causes driver fatigue and in fact, cause fatigue in many drivers who comply with the rules. Even the Dept. of Transportation's own Driver Fatigue and Alertness Study concludes that the hours of service rules need to be changed.

Secondly, the proposal suggests that it would be no small problem for carriers to produce documentation verifying for each trip, the mileage on the vehicle along with time and location for the driver at the beginning, middle and end of his/her trip. Most of the shippers and consignees our company works with do not show times on the delivery receipt or bill of lading. Other types of in-route documentation such as toll receipts, fuel receipts, scale receipts, etc. are often inaccurate due to incorrect (or pre-stamped) times. It would be extremely difficult and costly, if not impossible, to capture this information that the proposal requires. I'm sure the FHWA has heard from many carriers with the same concern.

Finally, when changes *are* made to supporting documentation requirements, specific uniform guidelines must be made so that carriers can keep on hand only what is necessary to accurately monitor drivers. It is unfair and unnecessary to have carriers keep an extraordinary amount of documentation on hand only to leave the discretion of its use to individual auditors. Only a proposal that puts everyone on the same playing field will earn the respect of the industry.

Again it seems only logical and fair to postpone the proposal until the hours of service rules are amended. At that time the other issues mentioned will need to be addressed. I respectfully request that the FHWA carefully consider these comments.

Respectfully,

A handwritten signature in black ink that reads 'Jeffrey W. Stonick'. The signature is written in a cursive, flowing style.

Jeffrey W. Stonick
Fleet Safety Manager
Total Logistic Control, LLC.